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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 BENJAMIN GALECKI,
15 Defendant.
16

Case No. 2:15-cr-00285-APG-EJY-2

**Joint Stipulation for Extension of
Time to File Defendant's Response
to the Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)
(Thirteenth Request)**

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18 The parties, through their respective counsel, request the current
19 December 7, 2022, deadline for Mr. Galecki's Response to the Government's
20 Motion to Substitute and Forfeit Property be extended by 90 days, with the
21 deadline reset for March 7, 2023.

22 Counsel for the government, Mr. Galecki, and co-defendant Charles Burton
23 Ritchie are still negotiating the terms of a stipulation that addresses for final
24 resolution the substitution and forfeiture issues before the Court and, if
25 successful, would negate the need for Mr. Galecki to file a Response. However
26

1 and despite continued significant progress, two events necessitate additional time
2 to resolve this process.

3 First, Mr. Galecki's ongoing recovery from emergent quintuple bypass
4 surgery in September has hindered the ability of his counsel to communicate
5 with him until relatively recently.

6 Second, the government provided the most recent proposed edits to the
7 joint stipulation draft to defense counsel in October. Counsel for Mr. Galecki and
8 Mr. Ritchie are now revising that draft for presentation to Mr. Ritchie's spouse,
9 Stephanie Ritchie. Additional time is thus necessary for this step in the revision
10 process, as well as for consideration of the revisions by Stephanie Ritchie and her
11 counsel.

12 The additional time requested will thus allow continued negotiation of the
13 draft stipulation. If, however, negotiations are unsuccessful, Mr. Galecki will file
14 his Response to the Government's Motion to Substitute and Forfeit Property
15 (ECF No. 582), present his own proposed forfeiture order for the Court's
16 consideration, or submit any other necessary motion for the Court's
17 consideration.

18 Counsel do not make this request for purposes of delay but act with
19 diligence and for the purpose of resolving the final forfeiture order in an efficient
20 manner without extended litigation and without unnecessarily taxing judicial
21 resources.

22 Counsel thus respectfully jointly request a 90-day extension of
23 Mr. Galecki's Response.

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1 This is the thirteenth request for an extension of time.

2 DATED this 5th day of December, 2022.

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4 RENE L. VALLADARES
Federal Public Defender

JASON FRIERSON
United States Attorney

5
6 *s/ Amy B. Cleary*
By _____
7 AMY B. CLEARY
Assistant Federal Public Defender

s/ Daniel D. Hollingsworth
By _____
8 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 BENJAMIN GALECKI,

7 Defendant.
8

Case No. 2:15-cr-00285-APG-EJY-2

**Order Resetting Deadline for
Defendant's Response to the
Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)**

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10 **IT IS HEREBY ORDERED** that the current December 7, 2022, deadline
11 for Defendant's Response to the Government's Motion to Substitute and Forfeit
12 Property (ECF No. 582) is vacated, extended by 90 days, and reset for
13 March 7, 2023, by which Mr. Galecki shall either submit his Response, any other
14 filing he deems appropriate, or a signed stipulation by all the relevant parties
15 resolving the forfeiture issues.

16 **Dated** this 6th day of December, 2022.

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19 _____
UNITED STATES DISTRICT COURT JUDGE